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CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-113 (DSD/BRT)

UNITED STATES OF AMERICA,

**FELONY INFORMATION**

Plaintiff,

18 U.S.C. § 371

v.

18 U.S.C. § 844(c)

18 U.S.C. § 844(i)

MOHAMED HUSSEIN ABDI,

18 U.S.C. § 853(p)

18 U.S.C. § 982(a)(2)(B)

Defendant.

18 U.S.C. § 982(b)(1)

28 U.S.C. § 2461(c)

THE ACTING UNITED STATES ATTORNEY CHARGES THAT:

**COUNT 1**

(Conspiracy To Commit Arson)

1. On or about May 28, 2020, in the State and District of Minnesota, the defendant,

**MOHAMED HUSSEIN ABDI,**

knowingly and intentionally conspired with others known and unknown to the United States Attorney to damage and destroy, and attempt to damage and destroy, by means of fire, a building used in interstate and foreign commerce and in activity affecting interstate and foreign commerce, namely, the Gordon Parks High School located at 1212 University Avenue West, in St. Paul, Minnesota, in violation of Title 18, United States Code, Sections 371 and 844(i).

**PURPOSE OF THE CONSPIRACY**

2. The purpose of the conspiracy was to commit an act of arson at the Gordon Parks High School located at 1212 University Avenue West, in St. Paul, Minnesota.

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**MANNER AND MEANS**

3. It was part of the conspiracy that on May 28, 2020, the defendant joined other co-conspirators who had gathered near the Gordon Parks High School building in the city of St. Paul, in the State and District of Minnesota, and thereafter set, attempted to set, and agreed to set, fires in the high school building.

**OVERT ACTS**

4. In furtherance of the conspiracy and to achieve its object, the defendant committed, directly and through co-conspirators, certain overt acts, including but not limited to the following:

- a. On the evening of May 28, 2020, the defendant met others outside one of the entrances to the Gordon Parks High School. The defendant followed a co-conspirator who declared an intention to set fire to the high school.
- b. The defendant and others punched and kicked the glass out of a door leading to the school cafeteria.
- c. The defendant and others entered the school. A co-conspirator provided the defendant with a liquid accelerant. The defendant poured the accelerant on the floor of the school cafeteria and inside a trashcan, which the defendant positioned near the door.
- d. The defendant poured a trail of accelerant on the ground behind him as he exited the school.

- e. The defendant attempted to light the fire while outside the building by leaning through the broken glass door. When that did not work, a co-conspirator handed the defendant a piece of clothing. The defendant doused the clothing with the accelerant. The defendant reentered the building, set the clothing on fire, and dropped the flaming garment into the trashcan near the door. As the defendant left the building, he tipped over the flaming trashcan towards the trail of accelerant that he had previously poured.

All in violation of Title 18, United States Code, Section 371.

#### **FORFEITURE ALLEGATIONS**

5. If convicted, the defendant, **MOHAMED HUSSEIN ABDI**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and pursuant to Title 18, United States Code, Section 844(c) and Title 28, United States Code, Section 2461(c), any explosive materials involved or used or intended to be used in the violation.

6. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

United States v. Mohamed Hussein Abdi

Dated: 03/22/2021

W. ANDERS FOLK  
Acting United States Attorney

A handwritten signature in cursive script, reading "Emily Polachek".

BY: EMILY A. POLACHEK  
MELINDA A. WILLIAMS  
Assistant U.S. Attorneys